

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division**

JANE DOE,

Plaintiff/Counter-Defendant,

v.

CHARLES TIPPETT

Defendant/Counter-Plaintiff,

LIBERTY UNIVERSITY, INC.,

Defendant.

Case No.: 6:21-cv-00059-NKM-RSB

Date: May 19, 2022

**PLAINTIFF/COUNTER-DEFENDANT'S
MOTION TO DISMISS THE COUNTERCLAIM**

COMES NOW, the Plaintiff/Counter-Defendant, Jane Doe ("Plaintiff"), by and through counsel, and pursuant to Rule 12(b)(6), hereby moves to dismiss the Counterclaim of Charles Tippet ("Defendant").

WHEREFORE, Plaintiff respectfully requests that the Court grant its Motion to Dismiss, and award Plaintiff any such further relief the Court deems appropriate.

Dated: May 19, 2022

Respectfully submitted,

/s/ Kevin E. Byrnes

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CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2022, the forgoing was served on all counsel of record in this matter via the court's electronic filing (ECF) system.

/s/ Kevin E. Byrnes
Kevin E. Byrnes, Esq.